

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

State of KANSAS,
State of GEORGIA,
State of SOUTH CAROLINA,
State of ARKANSAS,
State of FLORIDA,
State of IDAHO,
State of INDIANA,
State of IOWA,
State of LOUISIANA,
State of MISSOURI,
State of MONTANA,
State of NEBRASKA,
State of NORTH DAKOTA,
State of OKLAHOMA,
State of TENNESSEE,
State of TEXAS,
State of VIRGINIA,
MILES BERRY FARM, and
GEORGIA FRUIT AND VEGETABLE
GROWERS ASSOCIATION,
Plaintiffs,

v.

The UNITED STATES DEPARTMENT OF
LABOR,

JOSÉ JAVIER RODRÍGUEZ, Assistant
Secretary for Employment & Training, U.S.
Department of Labor, *in his official capacity*, and

JESSICA LOOMAN, Administrator, Wage &
Hour Division, U.S. Department of Labor, *in her
official capacity*,

Defendants.

Civil Action No. 2:24-cv-76-LGW-BWC

PLAINTIFFS' MOTION FOR STAY/PRELIINARY INJUNCTION/TEMPORARY
RESTRAINING ORDER

COMES NOW, the Plaintiffs in the above-styled action, and files combined motion for a stay/preliminary injunction/temporary restraining order of the Department of Labor Rule entitled, "*Improving Protections for Workers in Temporary Agricultural Employment in the United States*", 89 Fed. Reg. 33,898 (Apr. 29, 2024). This Motion is based upon the reasons set forth in the Brief filed contemporaneously herewith. In support thereof, plaintiffs submit the following:

- 1) Plaintiffs' Memorandum in Support of Motion for Stay/Preliminary Injunction/Temporary Restraining Order;
- 2) Declaration of Allen Miles
- 3) Declaration of Chris Butts
- 4) Declaration of Dick Minor
- 5) Declaration of Bill Brim
- 6) Declaration of Joseph Thompson
- 7) Declaration of Darrell E. Bassett
- 8) Declaration of Carrie Roth
- 9) Declaration of Diana Goldwire
- 10) Declaration of Phillip N. Davis
- 11) Declaration of Isabelle Potts
- 12) Declaration of Mary York
- 13) Declaration of Cody Waits
- 14) Declaration of Danilo Cabrera

Respectfully submitted this 13th day of June, 2024.

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CERTIFICATE OF SERVICE

This is to certify that I have this day served all parties with a copy of the foregoing pleading by filing it with the Court's electronic filing system. The Defendants will be served a copy via process server.

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